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(SPACE BELOW FOR FILING STAMP ONLY)

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
COMPANY and ALLSTATE INDEMNITY
COMPANY,

Plaintiffs,

vs.

OBTEEN N. NASSIRI, D.C., JENNIFER
NASSIRI, ALBERT NOORDA, M.D.,
ADVANCED ACCIDENT CHIROPRACTIC
CARE, DIGITAL IMAGING SERVICES aka
DIGITAL IMAGING SERVICES, LLC,
MARYLAND MEDICAL CENTER, LLC,

Defendants.

CASE NO. 2:08-cv-00369-JCM-GWF

**PROTECTIVE ORDER REGARDING
DEFENDANTS' FINANCIAL
INFORMATION**

The parties to the above-entitled action by and through their attorneys of record herein,
hereby agree as follows:

1. That good cause exists for the parties to enter into a Protective Order concerning
the Defendants' private financial information and private financial documents, which may be
obtained by the Plaintiffs through discovery efforts in this matter.

2. The parties believe that such an Order is necessary in this case as the Court has
ruled that Plaintiffs are entitled to make certain limited inquiries into the Defendants' financial
condition, during certain time periods relevant to the issues in this case.

1 3. As such, the parties hereby agree and stipulate that the following measures be
2 implemented in connection with any private financial information or private financial documents
3 that might be produced by the defendants to the plaintiffs pursuant to legitimate discovery
4 requests in this matter:

5 a. No party shall use any such financial information or documents obtained
6 for any purpose not related to the subject litigation. In this regard, the parties agree not to
7 disclose this information or these documents to anyone other than their lawyers and their
8 agents, experts, and the Court and/or the jury as the Court deems proper.

9 b. That whenever any of the private financial information or private financial
10 documents obtained from Defendants is in any pleading or exhibit filed with the Court, the
11 party filing such information will do so in a pleading wherein such pleading has been
12 requested to be filed under seal.

13 c. Upon the completion of this litigation, the parties agree that all such private
14 financial information obtained from the Defendants will be returned to the Defendant
15 from whom it was obtained, and/or destroyed at that defendant's preference.

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1 The parties to the above entitled litigation by and through their counsel hereby agree that
2 good cause exists for the following Protective Order and the procedures for use of the private
3 financial information and financial documents obtained from Defendants in this matter as
4 indicated above.

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6 Dated: September 14, 2010

Respectfully Submitted by:

7 McCORMICK, BARSTOW, SHEPPARD,
8 WAYTE & CARRUTH LLP

9 By: s/Bruce W. Kelley

Bruce W. Kelley, NV Bar No. 7331
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13 AGWARA & ASSOCIATES

14
15 By: _____

Liborius I. Agwara, Esq.
1058 East Sahara Avenue #B
Las Vegas, NV 89104

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17
18 Dated: September 14, 2010

SCHURERING, ZIMMERMAN, SCULLY,
19 TWEEDY & DOYLE, LLP

20 By: s/Thomas J. Doyle

Thomas J. Doyle, Esq.
400 University Avenue
Sacramento, California 95825-6502

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23 IT IS HEREBY ORDERED.

24 Dated: September 15, 2010



GEORGE FOLEY, JR.
United States Magistrate Judge